

**Amendment to the Drawings:**

Examiner objected to the drawings under 37 C.F.R. 1.83(a) asserting that the drawings fail to show every feature of the invention specified in the claims. Specifically, Examiner asserts that certain elements of claims 1, 11, 17, 22, and 24 are not shown in the drawings. Applicants respectfully disagree and, on such grounds, traverse. However, reserving the right to raise the issue on appeal, and in an effort to advance prosecution on the merits, Applicants have amended Claims 1, 11, 17, 22 and 24 to obviate Examiner's objections. Accordingly, Applicants respectfully request that Examiner withdraw the objections to the drawings.

### **REMARKS**

Claims 1-26 were rejected by the Examiner. Claims 1-26 are still pending. Reconsideration is respectfully requested in view of the amendments above and the following remarks.

#### **Claim Rejections under 35 U.S.C. § 112**

Claims 11-21 were rejected under 35 U.S.C. § 112, 1<sup>st</sup> ¶, as failing to comply with the written description requirement. Applicants have amended Claims 11 and 17 to obviate the rejections by Examiner. Claims 12-16 were rejected as being based upon a rejected base claim. Claims 18-21 were also rejected as being based upon a rejected base claim. Accordingly, Applicants respectfully request that Examiner reconsider the rejection of Claims 11-21, withdraw the rejections and allow Claims 11-21.

Claims 11-21 were rejected under 35 U.S.C. § 112, 2<sup>nd</sup> ¶, as failing to set forth the subject matter which the applicants regard as their invention. Applicants have amended Claims 11 and 17 to obviate the rejections by Examiner. Claims 12-16 were rejected as being based upon a rejected base claim. Claims 18-21 were also rejected as being based upon a rejected base claim. Accordingly, Applicants respectfully request that Examiner reconsider the rejection of Claims 11-21, withdraw the rejections and allow Claims 11-21.

#### **Claim Rejections under 35 U.S.C. § 103(a)**

Claims 1-26 were rejected under 35 U.S.C. § 103(a) as being unpatentable over prior art of record U.S. Patent No. 5,857,201 to Wright et al. (Wright) in view of U.S. Patent No. 5,295,222 to Wadhwa et al. (Wadhwa) in view of U.S. Patent No. 6,332,163 to Bowman-Amuah (Bowman-Amuah).

With respect to Applicants' Claim 4, Examiner states that Wright discloses "using the mobile data model to create a domain data store in a middle tier server" at 2:56-57. Applicants respectfully traverse.

Specifically, at 2:56-57 Wright discloses:

... updating the data source responsive to the manipulation by the server ...

As suggested by the plain language of the cited portion of Wright – “updating the data source” – creation of a domain data store is not contemplated. Distinct from Wright, Applicants Claim 4 requires an action “to create a domain data store”. In addition, Applicants Claim 4 requires “using the mobile data model to create a domain data store”. Still further, Applicants’ Claim 4 requires “using the mobile data model to create a domain data store in a middle tier server”. Applicants respectfully assert that the cited portion of Wright fails to disclose an action operable “to create a domain data store,” “using the mobile data model to create a domain data store,” or “using the mobile data model to create a domain data store in a middle tier server.” In addition to these arguments, Applicants respectfully request that Examiner consider the following.

At the above citation, Wright mentions only “updating the data source”. Applicants understand that the action of “updating” a data source requires that the data source already exist. Otherwise, there is nothing to be updated. Applicants have found no reference in Wright to the creation of a data source, in a middle tier server, on a server-side or anywhere else for that matter. In fact, the only references Applicants have found in Wright are to “existing” data sources. (See, e.g., lines 2 and 9 of the Abstract, 1:43-49, 2:24-26, 2:56-57, 6:10-12, 6:16-17, 6:19-20 (discussing “extending” data sources, suggesting the same already exist), 6:67 (discussing “synchronizing” the data source, again suggesting the data source already exists), 7:45-47 (discussing defining relationships between client applications and enterprise data sources, again suggesting existing data source, not created data sources), 7:67-81.) As mentioned above, updating implies changing something that already exists. Applicants’ claimed “creating” action, in stark contrast, clearly implies that following the operation, something that was not, now is. Thus, Applicants respectfully assert that the cited portion of Wright fails to disclose an action “to create a domain data store”, “using the mobile data model to create a domain data store,” or “using the mobile data model to create a domain data store in a middle tier server.” Accordingly, Applicants respectfully request that Examiner reconsider the rejection of Claim 4, withdraw the rejection and allow Claim 4.

For similar reasons, Applicants respectfully request that the Examiner reconsider the rejection of Claim 8. Specifically, Claim 8 requires, among other elements, “using the mobile data model to create a server-side data store”. As mentioned above, Wright discloses only the

manipulation of existing data stores (e.g., updating a data source) not creating a data store, let alone creating a data store using a "mobile data model," or the creation of a "server-side data store" as claimed in Applicants' Claim 8. Accordingly, Examiner reconsideration and allowance of Claim 8 is respectfully requested.

With respect to Claim 25, Examiner asserts that Wright discloses a method including the action of "including at least an integration portion of the mobile data model in an application comprising an integration component" at 6:49-56. Applicants respectfully traverse.

Specifically, at 6:49-56 Wright discloses:

Each of these connections is referred to as a 'session', during which time a specified set of operations are performed between the FL client and FL server. Examples of these sessions include connecting to retrieve work orders, checking inventory on a product, or retrieving a monthly price list update. Each "session" encompasses connecting the remote host, performing a specific task or set of tasks, and then disconnecting from the host.

In addition, Examiner states:

An integration component is inherent to the 'retrieve work order' session described in this passage. Without an integration component, a new work order would not be able to be examined.

Further examination of Wright is helpful in analyzing this rejection. Specifically, Wright states that "[e]xisting applications can easily be modified to provide simple data exchange facilities with PDA devices". (4:38-43.) Thus, like the existing technologies described in the background of Applicants' disclosure, Wright indisputably contemplates the use of targeted, specially designed applications/programs. Further evidencing this notion is Wright's detailed description of "agents" which follows the discussion of "sessions" relied upon by Examiner. Specifically, at 6:63-7:20 Wright states:

Communications agents, also just known as "agents", are developed to describe the communications "session". Communications agents know how to connect to a particular host, perform a set of operations or tasks, which usually includes synchronizing the host data source, e.g., 180, with the client database 172, and then disconnecting. The idea is that a developer can create a communications agent that represents each of the communications sessions that a field user may need. For example, there may be a communications agent that retrieves work orders, updates work orders, or downloads a price list. There may also be a

communications agent that simply checks inventory on a particular product. In general, communications agents are designed to encompass the fundamental operations that are needed to exchange data between a client and a host for a particular application.

The agent implementation is simple, and utilizes a simple software "object" to describe the agent. The developer creates a named object and provides a name, as well as other properties, which, upon connection, tell the FL server what type of session the FL client is requesting, as well as any parameters required to perform specific operations in that session. Agents may also specify a particular transport to minimize the cost of a connection, e.g., an agent needing a long connection time would use a less expensive type of transport.

Thus, there is little question as to whether Wright discloses integration components. However, throughout Wright's disclosure of its integration component there is absolutely no mention of an integration component having at least "an integration portion of the mobile data model" included therein. In fact, Wright, through its use of specialized sessions and agents, teaches away from Applicants' claimed concept of mobile data models and, instead, expressly relies on targeted, specially developed applications to perform desired tasks. Thus, Applicants' claimed concept of "including at least an integration portion of the mobile data model in an application comprising an integration component" is not inherent to Wright's sessions, agents or objects. In summary, at no point in the discussion referenced by Examiner or anywhere else in Wright's, is a method described which incorporates the action of "including at least an integration portion of the mobile data model in an application comprising an integration component" as claimed in Applicants' Claim 25. Accordingly, Applicants respectfully request that Examiner reconsider the rejection of Claim 25, withdraw the rejection and allow Claim 25.

With respect to Claim 23, Examiner states that Wright discloses "deriving a first mobile data model from an enterprise information system; and modifying the first mobile data model to yield the deployable mobile data model" at 4:38-43. (emphasis added.) Applicants respectfully traverse.

Specifically, at 4:38-43 Wright discloses:

Integrate PDA Data Transfer Functionality Into Existing Applications – Existing applications can easily be modified to provide simple data exchange facilities with PDA devices. This allows portions of databases to be carried into the field where they can be modified and later synchronized with the server database.

Nowhere in the cited portion of Wright, or anywhere else, is a method directed to “deriving a first mobile data model from an enterprise information system” described. Specifically, while Applicants do not dispute that Wright allows “portions of databases to be carried into the field where they can be modified and later synchronized with a server database,” the portions of databases disclosed in Wright are not described as having been derived from enterprise information system or as taking the form of a first data model. While, as Applicants claim, it is possible to derive a mobile data model from an enterprise information system, Wright’s disclosure of “allowing portions of databases to be carried into the field where they can be modified and later synchronized” does not necessarily disclose derivation of such databases from an enterprise data source. Instead, relying on the plain language of the citation above, Wright discloses taking portions of databases into the field, not deriving still other databases for use in the field. Instead, Wright expressly contemplates, at least at the portion relied upon by Examiner, carving out portions of an existing database and deploying the same on a mobile device for use in the field.

In addition, Wright might also provide one or more agents or sessions specifically designed to “Integrate PDA Data Transfer Functionality Into Existing Applications.” As such, there is no basis upon which to assert that Applicants’ claimed method of “deriving a first mobile data model from an enterprise system” is inherent to the Wright system. Instead, it is possible that an application interfacing a client database with the enterprise backend is specially programmed to extract data from a simple database and to know where such data is to be placed in the enterprise backend — which is in fact what Wright discloses as so stated in the cited portion at “Existing applications can easily be modified to provide simple data exchange facilities with PDA devices” — without the use of Applicants’ claimed mobile data model, let alone a “mobile data model” derived “from an enterprise information system” as claimed in Claim 23.

Assuming, *arguendo*, that Wright’s reference to either modifying “existing applications ... to provide simple data exchange facilities” or “allowing portions of databases to be carried into the field” in fact discloses “deriving a first mobile data model from an enterprise system” — these citations, indisputably, making no such disclosure — nowhere does Wright disclose modifying the derived mobile data model to yield a deployable mobile data model as required in Applicants’ Claim 23. Accordingly, Applicants respectfully request that Examiner reconsider the rejection of Claim 23, withdraw the rejection and allow Claim 23.

With respect to Claim 5, Examiner states that Wright discloses “wherein a first consumer receiving the mobile application can access and update data instances in the domain data store using the at least a portion of the mobile data model” at 4:38-49. Applicants respectfully traverse.

Specifically, at 4:38-49 Wright discloses:

Integrate PDA Data Transfer Functionality Into Existing Applications – Existing applications can easily be modified to provide simple data exchange facilities with PDA devices. This allows portions of databases to be carried into the field where they can be modified and later synchronized with the server database.

Referring to FIG. 1, a typical client/server (C/S) system 100 previously known in software technology is shown. The system 100 includes a database 102, one or more servers 104, such as a mail server 104', and a local area network (LAN) 106. Alternatively, the LAN could be a wide area network (WAN) or an intranet.

Additionally, this passage of Wright discloses the notion that “portions of databases [can] be carried into the field where they can be modified and later synchronized with the server database”. However, this passage and the remainder of Wright fail to disclose “wherein a first consumer receiving the mobile application can access and update data instances in the domain data store using the at least a portion of the mobile data model”. Importantly, Wright teaches not that client devices can update the domain server, but that it is the FormLogic server that manipulates the local database and updates the data source maintained on the enterprise side. (See, e.g., Abstract (Upon connection, this local database is automatically manipulated by the FL server.); 2:54-58 (the method comprising the steps of connecting the mobile client to the server; manipulating the client database by the server; updating the data source responsive to the manipulation by the server; and disconnecting the client from the server); 5:63:6:1 (During this connection, the FL server 132 is responsible for manipulation of the FL client database 172, including retrieving data that has been collected by the client since the last connection, or inserting new data in the database that has been added on the FL server 132 since the last connection.); 6:64-7:1 (Communications agents [deployed on the FL server] know how to connect to a particular host, perform a set of operations or tasks, which usually includes synchronizing the host data source, e.g., 180, with the client database 172, and then disconnecting.); 8:20-22 (Remote Database APIs [deployed on the FL server] “are used to directly manipulate the client database during a connection.”).) Thus, Wright fails to disclose

“wherein a first consumer receiving the mobile application can access and update data instances in the domain data store using the at least a portion of the mobile data model” as claimed in Applicants’ claim 5. Accordingly, Applicants respectfully request that Examiner reconsider the rejection of Claim 5, withdraw the rejection and allow Claim 5.

With respect to Claim 1, Examiner states that Wright discloses “a mobile data model ... required by a mobile application” at 5:49-52. Applicants respectfully traverse.

Specifically, at 5:49-52 Wright discloses:

The FL engine 160 incorporates a full local database implementation that allows data to be manipulated and collected by the FL client while not connected to the FL server 132.

Applicants do not believe Examiner is asserting that the FL engine of Wright discloses Applicants’ claimed “mobile data model ... required by a mobile application”. In the event Applicants are mistaken, Applicants respectfully assert that such a rejection is misplaced. In particular, the FL engine of Wright includes a user interface, a script engine, a communications module and a data store. (5:30-33.) Unless and until one disregards the context in which Applicants claimed their “mobile data model”, the FL engine of Wright cannot be said to disclose Applicants claimed “mobile data model ... [describing data manipulation/operation attributes] required by a mobile application”.

Setting aside the FL client and FL server of the above citation, all that reasonably remains available to disclose Applicants’ claimed “mobile data model ... required by a mobile application” is Wright’s reference to a “full local database implementation”. Applicants respectfully assert that this rejection is misplaced. In particular, Applicants Claim 1 recites both “creating a mobile data model, the mobile data model ... required by a mobile application” and “instantiating at least a portion of the mobile data model to create a mobile data store containing enterprise information.” Examiner rejecting this latter claim element over Wright at 2:24-26 and 2:50-58. Specifically, as quoted by Examiner, at 2:24-26 Wright discloses:

The client/server (C/S) architecture of the present invention is designed to allow the client to become a **direct extension of the corporate data sources**.

and at 2:50-58 Wright discloses:



...in a computer network, including a server, a data source, and a mobile client having a database, a method of synchronizing the client database and data source during a non-persistent connection, the method comprising the steps of connecting the mobile client to the server; manipulating the **client database** by the server; updating the **data source** responsive to the manipulation by the server; and disconnecting the client from the server.

(emphasis Examiner's)

Applicants respectfully assert that the passages used to reject each of Applicants' claimed limitations refer to the same object of Wright, *i.e.*, the "full local database" is the same entity as the "client database." (See, e.g., Abstract, 2:24-58, 5:30-59.) Specifically, what is mentioned at 2:24-26 and 2:50-58 is Wright's client database. (See, 5:41-44 (describing the data store as including one or more applications 170 and a remote database 172).) Examiner's citation of Wright at 5:49-52 notes this very client database. Examiner apparently equating the same to Applicants claimed "data model." Applicants respectfully assert that any such comparison is invalid on the face of Applicants' Claim 1 as Applicants' Claim 1 also claims a separate "data store" created from "instantiating at least a portion of the mobile data model."

While there may be nothing precluding Wright's reference to a single "full local database" from disclosing Examiner's dissected version of Applicants' "mobile data model ... required by a mobile application" and Applicants' claimed "mobile data store," such a reference firmly establishes that these passages do not disclose Applicants' claimed method of "creating a mobile data model ... required by a mobile application" and "instantiating at least a portion of the mobile data model to create a mobile data store". In summary, Wright's reference to an existing "full local database" and/or "client database" – Wright never discussing the creation of either a client database or a data source – cannot reasonably be construed to simultaneously disclose both "creating a mobile data model ... required for an application" and "instantiating at least a portion of the data model to create a mobile data store." In view of the foregoing arguments, Applicants respectfully request that Examiner reconsider the rejection of Claim 1, withdraw the rejection and allow Claim 1. In addition, since Examiner based the rejection of Claims 11, 17, 22, and 24 on the same reasoning as that applied to Claim 1, Applicants respectfully request that Examiner reconsider the rejection of Claims 11, 17, 22, and 24, withdraw the rejection and allow Claims 11, 17, 22, and 24.

In addition to those arguments presented above, Examiner acknowledges Wright fails to disclose “a mobile data model explicitly describing one or more data elements, data relationships, data dependencies and data distribution attributes required by a mobile application”. (See, page 15, 08.10.2006 office action.) As a result, Examiner has chosen to rely on Wright for the disclosure of only “a mobile data model ... required by a mobile application”. However, as a consequence of this selective dissection of Applicants’ claimed “mobile data model,” Applicants are left to seek out that portion of Wright purported to disclose Applicants claimed “mobile data model” – having reviewed Wright yet again, Applicants remain confused as to where the Applicants’ actual claimed “mobile data model,” without regard to the parameters Examiner asserts may be found in Wadhwa, may be found. Applicants respectfully contend that it is only because of this dissection and, therefore the making generic of Applicants’ claimed “mobile data model,” that one might be able to read Wright on elements of Applicants’ Claims 1, 11, 17, 22, and 24. Applicants respectfully assert that considering only the “mobile data model ... required by a mobile application” of Applicants’ claim inappropriately broadens that which Applicants considers their invention and that only by doing so is it possible to find disclosure in Wright of Applicants’ claimed invention.

In contrast to the claim element Examiner attributes to Applicants by way of dissection, Applicants have claimed, in essence, “a mobile data model ... [describing data manipulation/operation attributes] required by a mobile application”. When viewed in the actual context of Applicants’ claimed invention, setting aside that which Examiner acknowledges as not being disclosed by Wright, Wright indisputably fails to disclose Applicants’ claimed “mobile data model ... required by a mobile application.” Thus, it is only after Applicants’ claims have been inappropriately broadened that Wright could possibly be said to read on Applicants’ claimed invention. Accordingly, Applicants respectfully request that Examiner reconsider the rejection of Claims 1, 11, 17, 22, and 24 on the basis of Wright’s purported disclosure of a “mobile data model ... required by a mobile application”, withdraw the rejection and allow Claims 1, 11, 17, 22, and 24, as well as all claims that depend therefrom.

In addition, as discussed herein, Wright relies solely on agents, sessions, and other task specific programming to achieve its objectives. (See, e.g., 6:63-7:20.) Thus, Wright’s use of modified existing applications to perform simple data exchanges with client devices does not implicate the separate, explicit mobile data model described by applicants. In fact, as all of Wright’s

interfacing logic is incorporated into the modified existing applications, Wright has no need for the separate, explicit mobile data model claimed by Applicants.

These arguments are not based on amendments to the claims and address art repeatedly cited by Examiner. Therefore, Applicants respectfully assert that the present application is in a condition for allowance and that a new search should not be warranted.

### CONCLUSION

In light of the remarks set forth above, Applicants believe that they are entitled to a letters patent in the present matter. Applicants respectfully solicit Examiner to expedite prosecution of this patent application to issuance. Should Examiner have any questions or feel that further prosecution of this matter may be expedited through an interview, Examiner is encouraged to telephone the undersigned.

The Commissioner is authorized to charge any additional fees which may be required, including petition fees and extension of time fees, to Deposit Account No. 23-2415 (Docket No. 26625.704).

Respectfully submitted,

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